

Exhibit D

Timeline of Most Relevant Events

TIMELINE OF MOST RELEVANT EVENTS¹

September 20, 2018	Plaintiff filed the Complaint ² [Exhibit E] in the State Court.
October 15, 2018	The Debtors began to file their voluntary petitions for chapter 11 relief in this Court commencing the Bankruptcy Cases and the automatic stay went into effect.
January 9, 2019	This Court entered the Stay Extension Order [Exhibit B] extending the automatic stay as to, <i>inter alia</i> , Plaintiff's claims against Mr. Miguel in the Lawsuit.
January 24, 2019	The Stay Notice [Exhibit F] was sent to Plaintiff's counsel notifying Plaintiff's counsel of the automatic stay and the Stay Extension Order.
April 25, 2019	Plaintiff filed the Default Judgment Motion [Exhibit G] against the Default Judgment Defendants, including Mr. Miguel.
May 2, 2019	The State Court entered the Default Judgment [Exhibit H] against the Default Judgment Defendants, including Mr. Miguel.
August 26, 2020	Plaintiff's counsel sent the Demand Letter [Exhibit I] to Mr. Miguel, which, <i>inter alia</i> , offered to free Mr. Miguel from paying the Default Judgment but only if he did not contact his insurer.
October 9, 2020	Mr. Miguel and Plaintiff signed the First Settlement Agreement [Exhibit L], pursuant to which Mr. Miguel assigned to Plaintiff certain claims that he may have against ACE American.
March 25, 2021	Plaintiff and the Debtors entered into the Stay Relief Stipulation [Exhibit O], which, <i>inter alia</i> , acknowledged the automatic stay, the Stay Extension Order, and Plaintiff's desire to "resume" the Lawsuit, while granting prospective relief from the stay to allow Plaintiff to continue the Lawsuit solely against the Non-Debtor Defendants, including Mr. Miguel, and any insurer(s), but which did not mention the Default Judgment or First Settlement Agreement.
March 27, 2021	Plaintiff's counsel sent the Second Settlement Email [Exhibit M] to Mr. Miguel's counsel with the Draft Second Settlement Agreement [Exhibit N] attached, which did not reference the First Settlement Agreement, provided for a \$1.5 million confession of judgment, and assigned to Plaintiff certain claims that Mr. Miguel may have against ACE American, which claims had already been assigned to Plaintiff pursuant to the First Settlement Agreement.
April 5, 2021	This Court entered the Stay Relief Order [ECF No. 9392] approving the Stay Relief Stipulation.
June 23, 2021	Mr. Miguel signed the Second Settlement Agreement [Exhibit P] which contained the above described terms.
June 25, 2021	Plaintiff countersigned the Second Settlement Agreement.
June 30, 2021	Plaintiff filed the Miguel Motion to Vacate [Exhibit Q], dated as of June 24, 2021, seeking to vacate the Default Judgment against Mr. Miguel.
June 30, 2021	The State Court granted the Miguel Motion to Vacate [Exhibit R].
July 12, 2021	Plaintiff filed the Settlement Motion [Exhibit S], dated as of July 6, 2021, in the State Court, seeking approval of the reasonableness of the Second Settlement Agreement.
July 21, 2021	The State Court entered the Settlement Order [Exhibit U], approving the reasonableness of the Second Settlement Agreement.
September 2, 2021	The State Court entered the Confession of Judgment Order [Exhibit V] entering judgment against Mr. Miguel in the amount of \$1.5 million based on the Second Settlement Agreement.
September 8, 2021	Plaintiff filed an amended complaint naming ACE American as a defendant in the Lawsuit for the first time.

¹ This timeline was prepared for the convenience of the Court and does not include a complete description of the events identified herein nor all relevant events. Please refer to the Motion for a complete description of the relevant factual background.

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the *Motion of the Chubb Companies for Entry of an Order (I) Ruling that Default Judgment, Settlement Agreements and State Court Orders Are Void Ab Initio Pursuant to 11 U.S.C. §§ 105(a) and 362(a) and Without Effect; and (II) Granting Related Relief*.